

No. 90-220

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IN THE  
SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM, 1990

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RUDOLPH de SOUZA, Individual  
RUDOLPH de SOUZA, President  
RD/INTERNATIONAL, INC.

Petitioners

v.

WANDA L. SCHULTZ

Respondent.

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ON PETITION FOR WRIT OF CERTIORARI  
TO THE SUPREME COURT OF VIRGINIA,  
RICHMOND, VIRGINIA

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RESPONDENT'S BRIEF IN OPPOSITION

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RUDOLPH de SOUZA, Individual  
RUDOLPH de SOUZA, President  
RD/INTERNATIONAL, INC.

Petitioners

P.O. Box 16750  
Crystal City Station  
Arlington, Virginia 22215  
(407) 277-8920  
(pro se)



ARGUMENT

This argument is in response to

Respondent's Brief in Opposition.

Respondent's "verbal contract" was non-existent. There was a written contract executed by the Respondent and

Petitioner after the "verbal contract" that the Respondent claims allegedly took place. A significant portion of the taped recordings were made prior to Respondent's employment with

RD/International and is part of the conspiracy by the Respondent and her Associates to extort money from them.

Instead of taking into account the "written executed contract" the jury was erroneously allowed to take into account the Respondent's "verbal contract" and the testimony of Respondent's husband who obviously had a conflict of interest in this case.



The Respondent was negligent in her job of obtaining new business for her employer and spent nearly all of her time on writing her "grievance" with the U.S. Navy. Being frustrated as a result of being forced to resign from the Navy "precipitously" as in her own written admission, Respondent and Respondent's Attorney and their Associates conspired against Petitioner. It is to be noted that these very means were attempted by the Respondent against the U. S. Navy, but they were unsuccessful as the Navy had a well documented case about the Respondent on their files.

The Respondent was not hired as the Executive Vice President of the Corporation as Respondent's Attorney has alleged and Respondent was definitely not hired for a term of 5 years. Respondent in fact made false promises



to the employer, RD/International about obtaining new business and did not disclose to RD/International the reason for her being forced to resign "precipitously" from the Department of the Navy.

CONCLUSION

For all the foregoing reasons, and the federal questions and arguments raised in questions 2, 3, 4, 5, 6 and 7 of the original Petition for a Writ of Certiorari, this Court should exercise jurisdiction under Section 1257 of the Judicial Code and grant this petition for writ of certiorari.



Respectfully Submitted.

October 3, 1990



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Rudolph de Souza, Individual  
Rudolph de Souza, President  
RD/International, Inc.  
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Arlington, Virginia 22215  
(407) 277-8920

(pro se)



Three copies of this PETITION FOR A WRIT OF CERTIORARI have been mailed, first class, postage prepaid to Marnie E. Byrum, Esquire, Counsel for the Respondent 2009 North 14th Street, Suite 412, Arlington, Virginia 22201 this 3rd day of October, 1990.

*Rudolf de Souza*  
Rudolf de Souza &  
RD/International, Inc.

Respectfully submitted "Pro Se"

Rudolf de Souza, Individual  
Rudolf de Souza, President  
RD/International, Inc.

Mailing address:  
P.O. Box 16750  
Crystal City Station  
Arlington, Virginia 22215

STATE OF VIRGINIA

The following instrument was acknowledged before me this 3rd day of October, 1990, by Rudolf M. de Souza, President, RD/Intl. Inc.

*Christie A. Dowdell*

Notary Public;  
My commission expires: 4-6-91